

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of:

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Implementation of Section 621 (a)(1) of  
the Cable Communications Policy Act of 1984  
as amended by the Cable Television Consumer  
Protection and Competition Act of 1992

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MB Docket No. 05-311

**COMMENTS OF THE CITY OF WINCHESTER, KENTUCKY  
AND  
KENTUCKY REGIONAL CABLE COMMISSION**

The City of Winchester and the Kentucky Regional Cable Commission (KRCC) fully support the Federal Communication Commission's (F.C.C.) goal of competition in the cable television market. The primary concern for the City of Winchester and like situated communities who are members of the KRCC is for those jurisdiction or collection of jurisdiction which have a small population. As per footnote 56 of the Notice of Proposed Rulemaking, the Television and Cable Factbook indications are that some 8,409 operating cable systems exist in the United States. That same service (as noted in Footnote 57) indicates that 60% of cable subscribers are located in 301 systems and 80% are in some 706 cable systems.

Of the remaining 7,703 cable systems are communities such as Winchester, Kentucky. The City of Winchester and the KRCC desire competition through an overbuild of the existing cable systems. With a population of less than 20,000 individuals in Winchester, it is not likely that an overbuild will occur in the foreseeable future. Some of the jurisdictions which KRCC represent have fewer than 1,000 residents.

To deregulate in total, there would be 706 cable systems that might find themselves closer to an overbuild and consequently competition, while the vast majority of markets would be without the protection regulation provides and also without the benefits of competition. As to this situation, the City of Winchester requests that the F.C.C. consider continuing to allow regulatory protection.

Respectfully submitted,

Commission

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Dodd D. Dixon, Attorney at Law  
Executive Director Kentucky Regional Cable  
Mayor, City of Winchester

**CERTIFICATE OF SERVICE**

I do hereby certify that the original and four copies of the foregoing Comments of the City of Winchester, Kentucky and the Kentucky Regional Cable Commission has been placed in the U.S. mail, postage prepaid, this \_\_\_\_ day of February, 2006, and via email, addressed to the following:

Marlene Dortch, Commission's Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

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Dodd D. Dixon